



*Harry M. Lightsey III  
Executive Director  
Global Connected Consumer*

*General Motors Company  
25 Massachusetts Avenue, N.W.  
Suite 400  
Washington, D.C. 20001  
Phone: 202-775-5039  
Fax: 202-775-5054*

October 9, 2014

Ms. Kristine Fargotstein  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

Re: GN 14-28 "Protecting and Promoting the Open Internet"

Dear Ms. Fargotstein:

General Motors Company (NYSE:GM, TSX: GMM) and its partners produce vehicles in 30 countries, and the company has leadership positions in the world's largest and fastest-growing automotive markets. GM, its subsidiaries and joint venture entities sell vehicles under the Chevrolet, Cadillac, Baojun, Buick, GMC, Holden, Jiefang, Opel, Vauxhall and Wuling brands. More information on the company and its subsidiaries, including OnStar, a global leader in vehicle safety, security and information services, can be found at <http://www.gm.com>.

We write to express our concern about recent indications that the Commission is strongly considering eliminating the distinctions in the proposed Open Internet rules between mobile broadband Internet access and fixed broadband Internet access.

As the range of devices and services being connected by mobile broadband networks continues to increase, mobile broadband network operators will continue to need the regulatory flexibility to meet the range of demands new and emerging service are placing on them. The connectivity that we are incorporating into our vehicles is a prime example. Basic telematics, safety, and security services have been offered in vehicles over mobile networks for years; in General Motors' case, OnStar has offered connectivity in their cars since 1996. But, the advent of pervasive 4G LTE networks is opening the door to rapid innovation. Our cars are now connecting to advanced mobile networks to access not only voice services and telematics data, but increasingly streaming media such as Internet radio and video, and for passengers to connect their tablets and other devices to a built-in vehicle Wi-Fi hotspot. More importantly, real-time traffic and weather data, and vehicle-to-vehicle or vehicle-to-infrastructure communications, could leverage mobile networks in addition and as a complement to the 5.9 GHz DSRC spectrum to deliver road safety and efficiency improvements. This variety of data—being accessed in the most mobile of circumstances—will require a range of mobile network management techniques to successfully enable the services provided to our customers. By needlessly constraining the latitude our

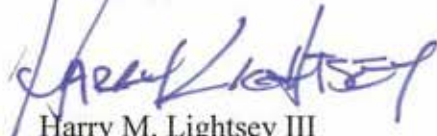
mobile network operator suppliers have in delivering their connectivity to owners of our vehicles, you would also constrain the innovations we are seeking to provide to our customers.

We've observed assertions that under the same rules for fixed and mobile networks, certain defined exceptions for "reasonable network management" for mobile broadband operators can provide the necessary flexibility. This was a point of view offered by the Chairman in the Mobile Broadband Roundtable the Commission hosted on September 16, 2014. From our point of view, mobile broadband being delivered to a car moving at 75 mph down a highway—or for that matter, stuck in a massive spontaneous traffic jam—is a fundamentally different phenomenon from a wired broadband connection to a consumer's home, and merits *continued* consideration under distinct rules that take this in to account. This is because the Commission can't define exceptions for "reasonable network management" for circumstances it can't imagine. And, as we continue to develop new and innovative uses for mobile broadband used by vehicles, we already know that neither we nor our mobile network operator suppliers can predict all of the techniques they may need to deliver services to our customers.

The coming years will see rapid innovation at the intersection of cars and mobile communications. We urge the Commission to preserve the regulatory environment that can continue to foster this, and retain the critical distinction between fixed and mobile internet broadband access so mobile providers and auto manufacturers alike can continue to deliver this innovation.

Thank you for your consideration.

Sincerely,



Harry M. Lightsey III

*Executive Director*

*Global Connected Consumer*